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September 30, 2011

Via Certified Mail: No. 7000 0600 0028 0018 5683

Director
Air Enforcement Division (2242A)
Office of Enforcement and Compliance Assurance
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, D.C. 20004

Via Certified Mail: No. 7000 0600 0028 0018 5676

Mr. James Hagedorn, Chief
Air Enforcement Branch
Mail Code 3AP20
U.S. Environmental Protection Agency – Region 3
1650 Arch Street.
Philadelphia, PA 19103

Via Certified Mail: No. 7000 0600 0028 0018 5669

Lori McNabb, Operations Chief
Air Quality Program
Pennsylvania Department of Environmental Protection
Meadville Regional Office
230 Chestnut Street
Meadville, PA 16335

Re: Saint-Gobain Containers, Inc
Port Allegany
Notice of Deviation
Global Consent Decree Civil Action Case No. 2:10-cv-00121-TSZ. W.D. Washington

Dear Sir or Madam:

You will note a new letterhead on this letter. Effective April 2010, all 12 Saint-Gobain glass packaging businesses around the globe (including Saint-Gobain Containers, Inc. ("SGCI") in the U.S.) became a single brand: Verallia.

SAINT-GOBAIN CONTAINERS
One Glass Place, P.O. Box 69 Port Allegany, PA 16743-0069
Tel: (814) 642-2521 • Fax: (814) 642-3204 • www.sgcontainers.com • www.verallia.com

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This letter constitutes formal written notice of a deviation of emission limits as required by Section X Paragraph 35.c.of the Consent Decree (CD) entered on May 7, 2010. Under this Paragraph, Saint-Gobain Containers, Inc. (SGCI) agreed to submit to the United States and the Affected State notice of a deviation or potential deviation of the requirements of the CD. Enclosed are a detailed description, duration, cause, and remedial steps taken to prevent a future reoccurrence of the deviation. A description of the deviation was also sent by email on September 30, 2011. The complete stack test report will be filed shortly. Note that the apparent deviation (a measured emission rate of 1.17 lb/ton total PM as compared to an emission limit of 1.0 lb/ton) occurred during a retest of the furnace emissions in late August. The retest was necessitated by a stack test protocol failure which occurred during a June stack test (a compromised filter resulted in invalidation of one test run). During the June test, the two valid test runs showed an average emission rate of 0.96 lb/ton.

If you have any questions or require additional information, please contact me at 814-642-3211.

Sincerely,
Saint-Gobain Containers, Inc.

René M. Beltran
Plant Manager

Cc: John W. Carroll
Pepper Hamilton, LLP
100 Market Street
Harrisburg, PA 17108

D. Knight, Saint-Gobain Containers, Inc.
A. McLenaghan, Saint-Gobain Containers, Inc.

Enclosures

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Notice of Deviation - 10 Day Notification

United States of America Plaintiff, and Commonwealth of Massachusetts, ET. AL., Plaintiff-Intervenors, v Saint-Gobain Containers, Inc. Defendant

Civil Action Case No. 2:10-cv-00121-TSZ

Facility mailing location: Contact Name: Contact Phone No.:	1 Glass Place, Port Allegany, PA 167431 Dan Decker, EHS Manager 814-642-3269
Section (Roman numeral) and Paragraph (Arabic numeral) of the Consent Decree violated:	IV.9.f.i
Description of the deviation:	During our annual compliance stack test for PM, performed on August 24, 2011, the results of which were reported to Verallia by letter dated September 20, 2011, the three-hour average total PM emission rate was measured at 1.17 lb/ton.
Duration or anticipated likely duration:	The duration of the exceedance is assumed to be limited to the period of the stack test, since earlier testing showed the furnace to be operating in compliance with the 1.0 lb/ton limit The furnace will be re-tested for compliance on October 20th.
Likely cause:	During the morning of the stack test a job change was performed of the furnace which increased the pull by 19.5 tons per day. Pull changes of this magnitude can cause temporary instability in the furnace combustion as gas is increased to maintain the glass temperature. This instability may have affected the PM stack test results.
Remedial steps taken or to be taken to prevent future deviation:	Since the installation of electric boost on this furnace, the staff of the Batch & Furnace department has been studying the effects of the boost on the tank and analyzing the tuning of the boost, gas and oxygen staging to determine the operating settings for optimal combustion at various pulls and especially for large pull changes. The plant's production team is also

	working with the corporate schedulers to try to minimize the number of job changes that create large pull changes.